

**FILED** JK  
**3/28/2022**  
 THOMAS G. BRUTON  
 CLERK, U.S. DISTRICT COURT

# UNITED STATES DISTRICT COURT

for the

Northern District of Illinois



\_\_\_\_ Eastern \_\_\_\_ Division

XYZ Corporation

Case No. 1:22-cv-01002

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☒ No

-v-

The Partnerships and Unincorporated Associations  
 Identified on Schedule A

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## THE DEFENDANT'S ANSWER TO THE COMPLAINT

### I. The Parties Filing This Answer to the Complaint

Provide the information below for each defendant filing this answer or other response to the allegations in the plaintiff's complaint. Attach additional pages if needed.

Name	Sunny Roller
Street Address	4113 Donna Dr
City and County	Benton, Saline
State and Zip Code	Arkansas 72015
Telephone Number	501-442-3514
E-mail Address	sunnyroller@ymail.com

### II. The Answer and Defenses to the Complaint

#### A. Answering the Claims for Relief

On a separate page or pages, write a short and plain statement of the answer to the allegations in the complaint. Number the paragraphs. The answer should correspond to each paragraph in the complaint, with paragraph 1 of the answer corresponding to paragraph 1 of the complaint, etc. For each paragraph in the complaint, state whether: the defendant admits the allegations in that paragraph; denies the allegations; lacks sufficient knowledge to admit or deny the allegations; or admits certain allegations but denies, or lacks sufficient knowledge to admit or deny, the rest.

**B. Presenting Defenses to the Claims for Relief**

Write a short and plain statement identifying the defenses to the claims, using one or more of the following alternatives that apply.

1. The court does not have subject-matter jurisdiction over the claims because *(briefly explain why there is no federal-question jurisdiction or diversity-of-citizenship jurisdiction; see the complaint form for more information)*  
 .
2. The court does not have personal jurisdiction over the defendant because *(briefly explain)*  
 I do not conduct significant business in Illinois nor in this Judicial District as alleged in 2. of the Plaintiff's complaint under Jurisdiction and Venue.
3. The venue where the court is located is improper for this case because *(briefly explain)*
4. The defendant was served but the process—the form of the summons—was insufficient because *(briefly explain)*
5. The manner of serving the defendant with the summons and complaint was insufficient because *(briefly explain)*
6. The complaint fails to state a claim upon which relief can be granted because *(briefly explain why the facts alleged, even if true, are not enough to show the plaintiff's right to recover)*
7. Another party *(name)* needs to be joined (added) in the case. The reason is *(briefly explain why joining another party is required)*

- a. If the basis for subject-matter jurisdiction is diversity of citizenship, state the effect of adding the other party:
- The other party is a citizen of the State of *(name)* \_\_\_\_\_.
- Or is a citizen of *(foreign nation)* \_\_\_\_\_. The amount of damages sought from this other party is *(specify the amount)* \_\_\_\_\_.
- b. If the claim by this other party is based on an alleged violation of a federal constitutional or statutory right, state the basis:

**C. Asserting Affirmative Defenses to the Claims for Relief**

Identify an affirmative defense or avoidance that provides a basis for the defendant to avoid liability for one or more of the plaintiff's claims even if the basis for the claim is met. Any affirmative defense or avoidance must be identified in the answer. Include any of the following that apply, as well as any others that may apply.

The plaintiff's claim for *(specify the claim)*

7. ..."Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope of the interworking of their illegal operation."

is barred by *(identify one or more of the following that apply)*:

1. Accord and satisfaction *(briefly explain)*
2. Arbitration and award *(briefly explain)*
3. Assumption of risk *(briefly explain)*
4. Contributory or comparative negligence of the plaintiff *(briefly explain)*
5. Duress *(briefly explain)*

6. Estoppel (*briefly explain*)

7. Failure of consideration (*briefly explain*)

The plaintiff refused to state what items or products are at issue and has not made schedule A available for review to know who the other defendants are. I can categorically deny that I am in any sort of partnership, relationship, or interworking with any other parties.

8. Fraud (*briefly explain*)

9. Illegality (*briefly explain*)

10. Injury by fellow employee (*briefly explain*)

11. Laches (Delay) (*briefly explain*)

12. License (*briefly explain*)

13. Payment (*briefly explain*)

14. Release (*briefly explain*)

15. Res judicata (*briefly explain*)

16. Statute of frauds *(briefly explain)*

17. Statute of limitations *(briefly explain)*

18. Waiver *(briefly explain)*

19. Other *(briefly explain)*

**D. Asserting Claims Against the Plaintiff (Counterclaim) or Against Another Defendant (Cross-Claim)**

For either a counterclaim against the plaintiff or a cross-claim against another defendant, state briefly the facts showing why the defendant asserting the counterclaim or cross-claim is entitled to the damages or other relief sought. Do not make legal arguments. State how each opposing party was involved and what each did that caused the defendant harm or violated the defendant's rights, including the dates and places of that involvement or conduct. If more than one counterclaim or cross-claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

1. The defendant has the following claim against the plaintiff *(specify the claim and explain it; include a further statement of jurisdiction, if needed)*:

2. The defendant has the following claim against one or more of the other defendants *(specify the claim and explain it; include a further statement of jurisdiction, if needed)*:

3. State briefly and precisely what damages or other relief the party asserting a counterclaim or cross-claim asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons that are alleged to entitle the party to actual or punitive money damages.



- a. The defendant asserting the counterclaim or cross-claim against *(specify who the claim is against)* alleges that the following injury or damages resulted *(specify)*:

- b. The defendant seeks the following damages or other relief *(specify)*:

### III. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this answer: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the answer otherwise complies with the requirements of Rule 11.

#### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

3/28/2022

Signature of Defendant



Printed Name of Defendant

Sunny Roller

#### B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Pro Se 3 (Rev. 12/16) The Defendant's Answer to the Complaint

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Telephone Number

E-mail Address

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERAN DIVISION**

XYZ Corporation,

Plaintiff,

Case No.: 1:22-cv-01002

V.

The Partnerships and Unincorporated

Associations Identified in Schedule A,

Defendants,

**ANSWER**

- 1) Agree
- 2) Deny
- 3) Deny
- 4) Lack knowledge required to admit or deny: do not know if it is true
- 5) Lack knowledge required to admit or deny: do not know if it is true
- 6) Deny
- 7) Deny
- 8) Deny
- 9) Lack knowledge required to admit or deny: do not know if it is true
- 10) Lack knowledge required to admit or deny: do not know if it is true
- 11) Lack knowledge required to admit or deny: do not know if it is true
- 12) Lack knowledge required to admit or deny: do not know if it is true
- 13) Lack knowledge required to admit or deny: do not know if it is true
- 14) Lack knowledge required to admit or deny: do not know if it is true
- 15) Lack knowledge required to admit or deny: do not know if it is true
- 16) Lack knowledge required to admit or deny: do not know if it is true
- 17) Lack knowledge required to admit or deny: do not know if it is true
- 18) Lack knowledge required to admit or deny: do not know if it is true
- 19) Lack knowledge required to admit or deny: do not know if it is true
- 20) Lack knowledge required to admit or deny: do not know if it is true
- 21) Lack knowledge required to admit or deny: do not know if it is true
- 22) Deny



- 23) Lack knowledge required to admit or deny: do not know if it is true
- 24) Lack knowledge required to admit or deny: do not know if it is true
- 25) Lack knowledge required to admit or deny: do not know if it is true
- 26) Deny
- 27) Deny
- 28) Deny
- 29) Deny
- 30) Deny
- 31) Deny
- 32) Lack knowledge required to admit or deny: do not know if it is true
- 33) Deny
- 34) Lack knowledge required to admit or deny: do not know if it is true
- 35) Deny
- 36) Deny
- 37) Deny
- 38) Lack knowledge required to admit or deny: do not know if it is true
- 39) Lack knowledge required to admit or deny: do not know if it is true
- 40) Lack knowledge required to admit or deny: do not know if it is true
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- 50) Lack knowledge required to admit or deny: do not know if it is true
- 51) Lack knowledge required to admit or deny: do not know if it is true
- 52) Lack knowledge required to admit or deny: do not know if it is true
- 53) Deny
- 54) Deny
- 56) Deny
- 66) Deny

67) Deny

68) Lack knowledge required to admit or deny: do not know if it is true

47) Lack knowledge required to admit or deny: do not know if it is true

Dated: March 28, 2022

Respectfully submitted,

/s/ Sunny Roller

4113 Donna Dr

Benton, AR 72015

Telephone: 501-442-3514

Email: [sunnyroller@ymail.com](mailto:sunnyroller@ymail.com)

## Notification of Legal Process Seeking Information

From: Etsy Legal (legal@etsy.com)

To: Sunnfish2003@yahoo.com

Date: Thursday, March 17, 2022, 12:36 PM CDT

Hello,

We received legal process seeking information, records, or other action regarding your account. In accordance with this notification, we have suspended your account privileges.

Please visit the following link to view the notice: <https://lawams.com/22-cv-01002>

We cannot provide you with legal advice. If you have questions about the legal process, you should consult an attorney. If you wish to object to the legal process, you or your attorney should contact the attorney who issued the subpoena or the issuing court. The contact email address for the issuing attorney is: [attorney@amsullivanlaw.com](mailto:attorney@amsullivanlaw.com).

Best,  
Bridget  
Etsy Legal  
<https://www.etsy.com/help>

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## Fw: Notification of Legal Process Seeking Information - 1:22-cv-01002

From: sunnfish2003@yahoo.com (sunnfish2003@yahoo.com)

To: attorney@amsullivanlaw.com

Date: Monday, March 28, 2022, 10:14 AM CDT

Ann Sullivan,

Please see my attached documents including Appearance From for Pro Se Litigants and Defendants Answer to Complaints.

I do believe that you are wrongfully including me in this suit. I am not based in China or any foreign country. I am not involved with any other sellers. I am a natural born American citizen formerly operating an Etsy shop and have resided in the state of Arkansas since 1998. I do not sell much of anything in the State of Illinois. As a result of this lawsuit my Etsy shop has been suspended and I do not have access to it keeping me from mounting a defense since I do not have my sales records. Also, since the trademark in question has been redacted, I cannot mount a defense.

Your allegation that I have tried to obscure my identity is patently false. My shop "about me" page included my photo, my real name, and a quick Google search would confirm those facts and provide a way to contact me. I am one of two people with the name Sunny Roller in the United States. Here is her information <https://www.sunnyrollerblog.com/sunny-roller-m-a/> Here is my information: <https://www.etsy.com/people/Sunnyroller> <https://www.linkedin.com/in/sunny-roller-1851a069/>

I will be filing a motion to dismiss myself as a defendant.

Also, your suit was filed on February 25, 2022 but I was not notified by Etsy until March 17, 2022. My mother was in the ER at Encore Heart Hospital in Bryant, Arkansas from March 16, 2022 through March 17, 2022 and I was with her the entire time. She was transferred to CHI St Vincent Hospital late March 17, 2022 where she had a partial hip replacement on March 18, 2022. She stayed at CHI St Vincent Hospital through March 24, 2022 until such a time as she was transferred to the Blossoms at Midtown Subacute and Rehab where she currently resides. I was with her day and night through the entirety of her stay at CHI St. Vincent. This is the first day I have been back at work with access to the resources to respond to your suit.

Best regards,

Sunny Roller  
501-442-3514

----- Forwarded Message -----

**From:** Etsy Legal <legal@etsy.com>

**To:** "Sunnfish2003@yahoo.com" <Sunnfish2003@yahoo.com>

**Sent:** Thursday, March 17, 2022, 12:36:06 PM CDT

**Subject:** Notification of Legal Process Seeking Information

Hello,

We received legal process seeking information, records, or other action regarding your account. In accordance with this notification, we have suspended your account privileges.

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We cannot provide you with legal advice. If you have questions about the legal process, you should consult an attorney. If you wish to object to the legal process, you or your attorney should contact the attorney who issued the subpoena or the issuing court. The contact email address for the issuing attorney is: attorney@amsullivanlaw.com.



Best,  
Bridget  
Etsy Legal  
<https://www.etsy.com/help>

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